

THE  
**COMPLIANCE**  
GROUP

February 24, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, DC 20554

Re: **Rural Broadband Now!, LLC**  
CPNI Certification Pursuant to 47 C.F.R. Â§ 64.2009(e)  
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Rural Broadband Now!, LLC ("Rural Broadband Now!"), enclosed herewith please find the company's Annual Customer Proprietary Network Information Certification ("CPNI Officer Certification") covering 2011.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Christopher A. Canter  
On behalf of Rural Broadband Now!, LLC

## **Rural Broadband Now!, LLC**

### **STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION**

Set forth below is a statement summarizing the policies and procedures of Rural Broadband Now!, LLC ("RBN") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.2001 et seq. RBN provides telecommunications services used exclusively to provide broadband services.

Because RBN solely provides broadband transmission services, the company therefore does not have direct access to CPNI. RBN does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with individual customers.

Nevertheless, RBN has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has informed its employees of the company's CPNI compliance policy. RBN does not release or distribute CPNI to unauthorized individuals; neither does the company use CPNI in violation of Section 64.200 § et seq. of the FCC's Rules.

RBN does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases broadband services, RBN takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

To the extent CPNI exists, it is maintained by RBN in a secure location which is not accessible by company employees without going through the company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

Moreover, any information constituting CPNI obtained by RBN is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes. In the event of unauthorized CPNI access, RBN will notify the requisite law enforcement agencies, and the customer when possible.

RBN did not have any breach of its customer records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because RBN does not provide telecommunication services, and does not know the identity of end-users whose traffic is routed through RBN, it cannot notify any end-user customers directly if a breach occurs. However, RBN has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

**Rural Broadband Now!, LLC**

**Annual CPNI Certification  
47 C.F.R. § 64.2009(e)  
EB Docket No. 06-36**

COMPANY NAME: Rural Broadband Now!, LLC

REPORTING PERIOD: January 1, 2011 - December 31, 2011

FILER ID: 827604

OFFICER: Mike Ireton

TITLE: President

I, Mike Ireton, hereby certify that I am an officer of Rural Broadband Now!, LLC ("RBN") and that I am authorized to make this certification on behalf of RBN. I have personal knowledge that RBN has established operating procedures that are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to RBN or to any of the information obtained by RBN. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures RBN employs to ensure that it complies with the requirements set forth in § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to RBN or to the information obtained by RBN.

Signed: 

On behalf of Rural Broadband Now!, LLC

Date: 2-21-12